

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

MARTIN J. WALSH,	)	
SECRETARY OF LABOR,	)	
U.S. DEPARTMENT OF LABOR,	)	
	)	
Plaintiff,	)	CIVIL ACTION FILE
	)	NO. 4:22-cv-3246
v.	)	
	)	
PACKERS SANITATION SERVICES,	)	
INC., LTD.	)	
	)	
Defendant.	)	

DECLARATION OF AMANDA CHRISTOPOULOS

I, Amanda Christopoulos, declare under penalty of perjury, as prescribed in 28 U.S.C. § 1746, that the following is true and correct:

1. I am a Regional Enforcement Coordinator and Investigator for the United States Department of Labor, Wage and Hour Division's Chicago Regional Office. I am part of the team assigned to investigate the Defendant's compliance with the child labor provisions of the Fair Labor Standards Act ("FLSA").

2. Before becoming a Regional Enforcement Coordinator, I was an investigator in the Grand Rapids District Office for over ten years. I have conducted 230 investigations as the lead investigator, including about fifty investigations focusing on child labor.

3. The statements made herein are based on my training and experience, my personal knowledge, observations made during the execution of the warrant involving Defendant (as discussed below), as well as conversations with representatives and employees of the Defendant in this matter.

### **The Defendant**

4. Packers Sanitation Services, Inc., Ltd., which may also operate as or do business as Packers Sanitation Services, LLC, (“PSSI”) is a cleaning and sanitation company that provides contract work at meat processing facilities. The PSSI location at 1016 Oxford St., Worthington, Minnesota 56187, is a workplace where it is believed that PSSI currently recruits and signs up employees to work for PSSI at a meat processing facility located at 1700 Highway 60 N.E. in Worthington, MN. The meat processing facility is owned and/or operated by JBS USA or one of its affiliates (“JBS”).

### **The Investigative Findings**

5. On August 24, 2022, the Wage and Hour Division initiated an investigation of PSSI to determine whether its practices complied with the FLSA, including its child labor provisions.

6. Prior to opening its investigation, Wage and Hour received a referral about possible child labor violations by PSSI in Grand Island, Nebraska from another law enforcement agency.

### **Execution of the Warrant**

7. Wage and Hour obtained warrants from U.S. Magistrate Judge Elizabeth Cowan Wright, in the District of Minnesota, authorizing Wage and Hour to inspect and enter PSSI’s storefront facility at 1016 Oxford St., Worthington, MN 56187, and the JBS pork production facility at 1700 Highway 60 N.E., Worthington, MN 56187, and “to inspect the production facility of JBS Live Pork, LLC (“JBS”) and, relatedly, Packers Sanitation Services, Inc. Ltd. (“PSSI”) under section 11(a) of the FLSA, including but not limited to transcribing or copying all relevant records and data in whatever form maintained

including paper or electronic for the previous three-year period, and privately questioning any workers or employees on the premises during working hours, regarding alleged violations of Sections 6, 7, 11, 12, and 15(a) of the Act, 29 U.S.C. §§ 206, 207, 211, 212, 215(a).”

8. On October 13, 2022, Wage and Hour executed the warrants on the JBS facility located at 1700 Highway 60 N.E. during the workers’ shift. I arrived at the JBS facility at 2:00 a.m. Six investigators accompanied me for the inspection. We produced a copy of the warrant to JBS Security Officer Travis Bright and were permitted entry into the facility.

9. I met PSSI In-House Safety Specialist Yarik Morales Vargas in a safety room so I could download files from the PSSI laptop onto an external hard-drive. When I approached Mr. Vargas on his computer to download files, I observed him dragging items with his mouse into the recycle bin before giving me access to sit down at the computer. I asked him why he was deleting files and advised him to stop moving items into the recycle bin, after which he replied he was just getting things organized for me on the computer.

Executed on this 03 day of November, 2022.



Amanda Christopoulos  
Regional Enforcement Coordinator  
Wage and Hour Division  
U.S. Department of Labor